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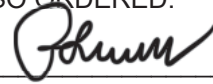
52 DUANE ST  
NEW YORK

Office: 212-951-1232  
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Honorable Philip M. Halpern  
United States District Court  
Southern District of New York

Application granted. Defendant's bail is continued until his sentencing date on September 25, 2025. All of Defendant's bail conditions remain in full force and effect. Defendant should be prepared to be remanded to the custody of the United States Marshal following the sentencing. The Clerk of Court is respectfully directed to terminate the pending letter-motion (Doc. 25).

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
July 21, 2025

**RE:** *United States v. Ecequiel Reyes, 7:24-cr-00631-PMH*

Dear Justice Halpern,

This letter is submitted on behalf of defendant Ecequiel Reyes, to respectfully request that Mr. Reyes, who is presently scheduled to surrender to the U.S. Marshal's Service by July 25, 2025, be permitted to delay surrender until a date in late September, 2025, due to medical issues.

As the Court is aware, on May 5, 2025, the Court accepted Mr. Reyes' guilty plea. Following his plea, the Court granted defendant's application to continue his bail until June 27, 2025, finding he had clearly shown that he was not likely to flee or pose a danger to the community and there were exceptional reasons under 18 USC 3145(c). The Court modified the bail conditions to include location monitoring via GPS.

On March 20, 2025, prior to his plea, Mr. Reyes was involved in a motor vehicle accident as a back seat passenger. He sustained injuries to his left knee, left shoulder, neck and lower back and went to the hospital the following day as his pain increased.

Initially, Mr. Reyes was attending physical therapy sessions to help alleviate pain. However, in

recent weeks, the pain had increased greatly with radiating pain in his lower back, burning sensations around his neck and sharp pain to his shoulder area. He was diagnosed with intervertebral and cervical disc displacement in several areas, muscle spasms to the back, and multi-level thecal sac impingement and facet arthropathy.

The Court granted Mr. Reyes a delay in his scheduled turn in date to allow him time to undergo an epidural procedure. On or about June 26, 2025, Mr. Reyes underwent the epidural procedure. However, it has been ineffective in relieving his continued pain and discomfort.

Mr. Reyes is now scheduled to undergo a Lumbar Discectomy with Rhizotomy and Facet Joint Fusion on July 24, 2025 at LR Medical, PLLC in Brooklyn, NY. Said surgery will require time for healing and rehabilitation.

As the defense believes Mr. Reyes' current physical condition and upcoming surgery falls under exceptional conditions, we are again asking this Court to allow Mr. Reyes to surrender on a date in late September of 2025.

I have spoken with AUSA Reyhan Watson, who takes the following position: *"...with the starting point being that the Court has already granted an extension relating to these issues, and assuming the surgery is medically justified and the recovery period would not extend beyond a few weeks, it would not oppose a delay of a few weeks so Mr. Reyes can have the surgery and any necessary post-operative follow-up care."*

If the Court has any questions or concerns, please contact my office. Thank you for your attention in this matter.

/s/ Julie Rendelman  
Julie Rendelman, ESQ.  
Attorney for Defendant Ecequiel Reyes  
cc: Reyhan Watson, AUSA

## Law Offices of Julie Rendelman, LLC

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July 20, 2025

**RE:** *United States v. Ecequiel Reyes, 7:24-cr-00631-PMH*

Exhibit A: Medical Records



## LR Medical, PLLC

2277-83 CONEY ISLAND AVE, Ste 2A,  
BROOKLYN, NY 11223

Email: [sa@painfreenyc.com](mailto:sa@painfreenyc.com)

T. 646-334-4326 F. 718-998-9891

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July 17, 2025

PATIENT: **Reyes, Ecequiel**

To Whom It May Concern,

Please be advised, the Lumbar Discectomy with Rhizotomy and Facet Joint Fusion for the above-mentioned patient is scheduled for 07/24/2025.

Procedure will take place at Island Ambulatory Surgical Center: 2277-83 Coney Island Ave 1<sup>st</sup> Floor, Brooklyn NY 11223.

A nurse will contact the patient 24 hours before the appointment date to give instructions and confirm the appointment time.

Should you have any questions or require additional information, please do not hesitate to contact Shashan at 646-334-4326.

Thank You.

Pain Management

